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Hearing Date and Time: August 30, 2011 at 10:00 a.m. (Prevailing Eastern Time)

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Attorneys for the Ad Hoc Group of Lehman Brothers Creditors

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

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Debtors. : (Jointly Administered)

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STATEMENT OF THE AD HOC GROUP OF LEHMAN BROTHERS CREDITORS IN SUPPORT OF APPROVAL OF DEBTORS' DISCLOSURE STATEMENT FOR SECOND AMENDED JOINT CHAPTER 11 PLAN

TO THE HONORABLE JAMES M. PECK, UNITED STATES BANKRUPTCY JUDGE:

The Ad Hoc Group of Lehman Brothers Creditors (the "Group"), by and through its undersigned counsel, hereby files this statement in support (the "Statement") of this Court's approval of the Debtors' Disclosure Statement for Second Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors Pursuant to Section 1125 of the Bankruptcy Code (the "Debtors' Disclosure Statement") [Docket No. 18205], filed on July 1, 2011, by Lehman Brothers Holdings Inc. and its affiliated debtors (collectively, the "Debtors") in these chapter 11 cases. As and for its Statement, the Group respectfully represents as follows:

STATEMENT

- 1. On June 30, 2011, the members of the Group's steering committee each entered into separate plan support agreements (the "PSAs") with the Debtors with respect to the Second Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the "Debtors' Plan") [Docket No. 18204]. Pursuant and subject to the terms and conditions of the PSAs, the Group supports the Debtors' Plan and the Debtors' Disclosure Statement.
- 2. The Group anticipates that it will file a more comprehensive statement supporting the Debtors' Disclosure Statement in connection with a reply to any objections.

WHEREFORE, for the foregoing reasons, the Group requests that the Court approve the Debtors' Disclosure Statement and grant any other relief the Court deems just and proper.

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Dated: August 11, 2011 New York, New York

Respectfully submitted,

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By: <u>/s/ Gerard Uzzi</u> Gerard Uzzi

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